

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania

216 Haddon Avenue, Ste. 406

Westmont, NJ 08108

(215) 627-1322

Attorneys for Ditech Financial, LLC.

IN THE MATTER OF:

Kenny E. Welch Sr

DEBTOR(S),

TO:

Kenny E. Welch Sr

220 S Lenola Road

Maple Shade, NJ 08052

Thomas G. Egner

McDowell Law, PC

46 West Main Street

Maple Shade, NJ 08052

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-19727 ABA

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

Isabel C. Balboa

Chapter 13 Standing Trustee

Cherry Tree Corporate Center - 535 Route 38 - Suite
580

Cherry Hill, NJ 08002

US TRUSTEE

Office of the US Trustee

One Newark Center, Suite 2100

Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Ditech Financial, LLC.**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **UNITED STATES BANKRUPTCY COURT FOR THE ALL DISTRICT**, , for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **222 Chestnut St, Mount Holly NJ 08060**. The hearing on this matter is scheduled for **December 4, 2018 at 10:00 A.M.**

Dated: November 7, 2018

/s/Denise Carlon, Esq.

Denise Carlon, Esquire

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